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November 9, 2016

The Honorable Analisa Torres
The Honorable Kevin Nathaniel Fox
United States District Court for the Southern District of New York

Re: Alli v. Moore, et al., No. 14 Civ. 6597 (AT) (KNF)

Dear Judge Torres and Judge Fox:

I represent Plaintiff Umar Alli in the above-captioned Section 1983 litigation. Last week the Parties appeared for conference before the Court to discuss, among other things, Plaintiff's wish to file an amended complaint.

Up until this point, Mr. Alli's operative complaint has been his original, handwritten complaint. Today I have filed Mr. Alli's First Amendment Complaint, and Mr. Alli argues that this amendment is as of right pursuant to FRCP 15 because Defendants, though they have largely been properly served, never answered or otherwise responded to the Original Complaint.

Defendants appear to have the same understanding regarding the First Amended Complaint's filing (I have conferred with Defense Counsel earlier today). However, they have not waived their right to interpose an objection if they see fit within their time to answer or otherwise respond. Thus, if there is some Defense objection, they will raise it in a separate filing.

Finally, insofar as Mr. Alli perfected service of the vast majority of the Defendants when his Original Complaint was in place, Defense Counsel has agreed to consider Defendants served upon the filing of the First Amended Complaint so that Mr. Alli does not have to undertake service efforts anew. Thank you.

Sincerely,

A handwritten signature in blue ink that reads "Ryan Lozar".

Ryan Lozar